

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
DETROIT DIVISION**

ALLEN K. SMITH,

Plaintiff,

v.

THE CREDIT PROS
INTERNATIONAL, LLC,

Defendant.

Case No. 2:23-cv-11582-LVP-APP

Honorable District Judge Linda V. Parker

Honorable Magistrate Judge Anthony P. Patti

JOINT DISCOVERY PLAN

Pursuant to the Court's August 5, 2024 Order [Dkt. 24], the Parties jointly submit their Joint Discovery Plan and proposed deadlines for the Court's review and consideration:

(A) Summarize the background of the action, the principal factual and legal issues for both sides, and the relief sought by the plaintiff(s):

Summary of Action: Plaintiff brings this action seeking redress for violations of the Credit Repair Organizations Act ("CROA"), pursuant to 15 U.S.C. § 1679 *et seq.*, and the Michigan Credit Services Protection Act ("MCSPA"), pursuant to M.C.L. § 455.1821 *et seq.* Specifically, Plaintiff alleges that Defendant failed to comply with the CROA and the MCSPA in connection with credit repair services it rendered to Plaintiff.

Principal and Factual Issues: The principal factual and legal issues will be whether Defendant complied with its obligations under the CROA and MCSPA in connection with the credit repair services it rendered to Plaintiff.

Relief Sought: Plaintiff is seeking actual damages and his attorney's fees and costs.

(B) Proposed Discovery and Trial Plan:

1. Amend the Pleadings and Add Parties: **September 30, 2024**
2. Fact Discovery Cutoff: **January 30, 2025**
3. Expert Disclosure Deadline: **February 21, 2025**
4. Expert Rebuttal Deadline: **March 21, 2025**
5. Expert Discovery Cutoff: **April 30, 2025**
6. Dispositive Motions Deadline: **May 30, 2025**
7. Witness Disclosure Deadline: **June 20, 2025**
8. Final Pretrial Conference: **July 25, 2025**
9. Trial Date: **August 15, 2025**

(C) Describes any outstanding or anticipated discovery disputes, the bases for any objections, and any anticipated motions, including dispositive motions:

None at this time.

Dated: September 10, 2024

/s/ Mohammed O. Badwan

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Respectfully submitted,

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